

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Beckham Jewelry, LLC, Debtor**

**Case No. 25-01234-JAW  
CHAPTER 11**

**NOTICE**

Debtor has filed papers with the court for authority to pay unpaid pre-petition wages, salaries, and related withholdings.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the Court grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
P.O. Box 2448  
Jackson, MS 39225-2448

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

Thomas C. Rollins, Jr.  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion for Authority to Pay Unpaid Pre-Petition Wages, Salaries, and Related Withholdings.

Date: June 30, 2025

Signature: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
The Rollins Law Firm, PLLC  
P.O Box 13767  
Jackson, MS 39236  
601-500-5533  
trollins@therollinsfirm.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Beckham Jewelry, LLC, Debtor**

**Case No. 25-01234-JAW  
CHAPTER 11**

**DEBTOR'S MOTION FOR AUTHORITY TO PAY UNPAID  
PRE-PETITION WAGES, SALARIES, AND RELATED WITHHOLDINGS**

Beckham Jewelry, LLC (the “Debtor”), by and through undersigned counsel, submits this *Motion for Authority to Pay Unpaid Pre-Petition Wages, Salaries, and Related Withholdings*. The Court has jurisdiction under 28 U.S.C. §§ 157 & 1334; this is a core proceeding under 28 U.S.C. § 157(b)(2)(A) & (O).

**Background**

The Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code on May 14, 2025 (the “Petition Date”) and elected treatment under Subchapter V. Thomas C. (“T.C.”) Rollins, Esq. represents the Debtor; Craig Geno serves as the Subchapter V trustee (the “Trustee”).

The Debtor operates a single-location retail jewelry store in Jackson, Mississippi, and continues to manage its property and business as debtor-in-possession pursuant to 11 U.S.C. §§ 1184 and 1107.

Due to strained liquidity immediately before the petition date, certain payroll checks scheduled to be funded before May 14, 2025 (the “Petition Date”) were not issued. Consequently, the Debtor owes each Employee the pre-petition amounts shown in Exhibit A.

All amounts were earned within 180 days of the Petition Date and fall well below the \$17,150 per-employee cap of 11 U.S.C. § 507(a)(4)-(5). The Debtor also must remit

withheld federal and state payroll taxes and matching FICA contributions (collectively, the “Payroll Taxes”), which are not property of the estate under § 541(b)(7).

### **Relief Requested**

The Debtor seeks authority (a) to pay the Wage Obligations (not to exceed \$17,150 per Employee) and the Payroll Taxes in the ordinary course.

The Debtor further requests that the Court waive the 14-day stay under Fed. R. Bankr. P. 6004(h) so that the order becomes effective immediately upon entry.

### **Basis for Relief**

A debtor may use estate property outside the ordinary course when there is a “sound business purpose.” Paying the Employees fulfills that standard because the Debtor cannot continue operations—or preserve value for creditors—without them.

Section 105(a) authorizes the Court to “issue any order...necessary or appropriate” to carry out chapter 11’s provisions. Courts routinely invoke § 105(a) with § 363(b) to permit payment of critical employee wages.

The Wage Obligations qualify as priority claims under §§ 507(a)(4) & (5) and must ultimately be paid in full under § 1129(a)(9)(B). Granting this Motion merely accelerates payment of claims that will receive 100 ¢-on-the-dollar at confirmation.

Without prompt payment, the Employees may resign, exposing the estate to replacement costs and loss of customer goodwill.

WHEREFORE, the Debtor respectfully requests that the Court enter an order:

1. Authorizing, but not directing, the Debtor to pay the Wage Obligations and Payroll Taxes set forth in Exhibit A in an amount not to exceed the caps in 11 U.S.C. § 507(a)(4)-(5);

2. Waiving the 14-day stay imposed by Fed. R. Bankr. P. 6004(h); and
3. Granting such other and further relief as the Court deems just and proper.

Respectfully submitted.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
601-500- 5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that I have this day electronically filed with the Court, a true and correct copy of the above and foregoing Motion on this date, June 30, 2025. All interested parties will receive CM/ECF from the Court.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, jr.

**Schedule of Unpaid Pre-Petition Wages**

Employee	Gross Amount Due	Pay Periods Covered
Christa Fitzhugh	\$1,224.09	03/14/25 – 04/24/25
Tyler Hutson	\$4,859.62	12/20/24 – 02/13/25
Victor Van Patten	\$426.37	02/28/25 – 04/10/25
Penelope Vaughn	\$7,161.60	12/20/24 – 04/24/25

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

BECKHAM JEWELRY, LLC

CASE NO: 25-01234

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 11

On 6/30/2025, I did cause a copy of the following documents, described below,

Notice and Motion to Pay Wages

Exhibit A

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 6/30/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
BECKHAM JEWELRY, LLC

CASE NO: 25-01234

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 11

On 6/30/2025, a copy of the following documents, described below,

Notice and Motion to Pay Wages

Exhibit A

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/30/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 25-01234  
SOUTHERN DISTRICT OF MISSISSIPPI  
MON JUN 30 11-51-25 PST 2025

## DEBTOR

BECKHAM JEWELRY LLC  
120 DISTRICT BLVD STE D110  
JACKSON MS 39211-6304

MCLEOD ASSOCIATES PA  
10 PROFESSIONAL PARKWAY  
HATTIESBURG MS 39402-2636

~~EXCLUDE~~

~~(U)TDLDC RETAIL I LLC~~

~~EXCLUDE~~

~~(U)WILKERSON INC~~

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
THAD COCHRAN US COURTHOUSE  
501 E COURT STREET  
SUITE 2300  
JACKSON MS 39201-5036~~

BARNES BAILEY JANO  
5 RIVERBEND PLACE  
STE A  
FLOWOOD MS 39232-7618

BRIAN BECKHAM  
120 DISTRICT BLVD  
STE D110  
JACKSON MS 39211-6304

BRIAN BECKHAM  
2 ASHLEY PARK DR  
JACKSON MS 39206-6156

DAZZLE IMPORTS  
5555 GLENDRIDGE CONNEC  
STE 200  
ATLANTA GA 30342-4815

DYNASTY CASTING  
644 SHREWSBERRY COMMON  
SHREWSBURY PA 17361-1617

ELDAR INC  
3068 N 2700 E  
FORREST IL 61741

GARY CARRIERE  
725 WOODLAND ST  
SULPHUR LA 70663-1046

HAKIMI DIAMOND CORP  
15 W 47TH ST  
NEW YORK NY 10036-3305

HEERA MOTI INC  
15 W 47TH ST  
STE 808  
NEW YORK NY 10036-3327

HINDS CO TAX COLLECTOR  
PO BOX 1727  
JACKSON MS 39215-1727

HINDS COUNTY TAX COLLECTOR  
316 SOUTH PRESIDENT ST  
JACKSON MS 39201-4801

IRS  
CO US ATTORNEY  
501 EAST COURT ST  
STE 4430  
JACKSON MS 39201-5025

IRS  
CENTRALIZED INSOLVENCY  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

(P)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

KAPITUS  
2500 WILSON BLVD STE  
ARLINGTON VA 22201-3873

KELLY WATERS  
PO BOX 240924  
BOSTON MA 02124-0016

KERRY WHITT CO  
125 DEATON RD  
OWENS CROSS ROADS AL 35763-9553

LAMHA  
20 W 47ST ST  
STE 807  
NEW YORK NY 10036-4298

MS DEPT OF REVENUE  
BANKRUPTCY SECTION  
PO BOX 22808  
JACKSON MS 39225-2808

MCLEOD RIGEL PA  
10 PROFESSIONAL PKWY  
HATTIESBURG MS 39402-2636

MISSISSIPPI DEPARTMENT OF REVENUE  
BANKRUPTCY SECTION  
PO BOX 22808  
JACKSON MS 39225-2808



## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

NIVODA  
580 5TH AVE  
STE 2508  
NEW YORK NY 10036-4771

OVERNIGHT MOUNTINGS I  
1400 PLAZA AVE  
NEW HYDE PARK NY 11040-4921

ROBERT B IRELAND III ESQ  
WATKINS EAGER PLLC  
ATTY FOR TDLDC RETAIL I LLC  
PO BOX 650  
JACKSON MS 39205-0650

S KASHI  
175 ROAD STE 204  
GREAT NECK NY 11021

STULLER  
PO BOX 87777  
LAFAYETTE LA 70598-7777

TDLDC RETAIL I LLC  
300 CONCOURSE BLVD  
STE 105  
RIDGELAND MS 39157-2091

TR JEWELRY CONCEPTS  
2707 MT RUSHMORE RD  
RAPID CITY SD 57701-5324

US ATTORNEY SD MISSISSIPPI  
CO INTERNAL REVENUE SERVICE  
501 E COURT STREET STE 4430  
JACKSON MS 39201-5025

US ATTORNEY SD MISSISSIPPI  
CO US SECURITIES AND EXCHANGE COMMISS  
501 E COURT STREET STE 4430  
JACKSON MS 39201-5025

US SECURITIES AND EXCHANGE COMMISSION  
OFFICE OF REORGANIZATION  
950 EAST PACES FERRY ROAD SUITE 900  
ATLANTA GA 30326-1382

US ATTORNEY GENERAL  
US DEPT OF JUSTICE  
950 PENNSYLVANIA AVENW  
WASHINGTON DC 20003

~~EXCLUDE~~

~~UNITED STATES TRUSTEE  
501 EAST COURT STREET  
SUITE 6 430  
JACKSON MS 39201-5022~~

WLBT  
715 S JEFFERSON ST  
JACKSON MS 39201-5622

WLBT TELEVISION  
CO SZABO ASSOCIATES INC  
3355 LENOX ROAD NE SUITE 945  
ATLANTA GA 30326-1357

WILLIAM E MCLEOD ESQ  
MCLEOD ASSOCIATES PA  
COUNSEL FOR MCLEOD ASSOCIATES PA  
10 PROFESSIONAL PARKWAY  
HATTIESBURG MS 39402-2636

~~EXCLUDE~~

~~CRAIG M CENO  
LAW OFFICES OF CRAIG M CENO PLLC  
601 RENAISSANCE WAY  
SUITE A  
RIDGELAND MS 39157-6038~~

JENNIFER A CURRY CALVILLO  
THE ROLLINS LAW FIRM  
702 W PINE ST  
HATTIESBURG MS 39401-3836

~~EXCLUDE~~

~~(U) JOSEPH NORRIS~~

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR  
THE ROLLINS LAW FIRM PLLC  
PO BOX 13767  
JACKSON MS 39236-3767~~